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December 31, 2013

U.S. EPA Region 9
FOIA Officer OPA-3
75 Hawthorne Street
San Francisco, CA 94105

Re: **FOIA Request**

Jeffrey Emerson and Karen Emerson v. Allied Packing Supply, Inc., et al.
Alameda County Superior Court No. RG13698637

Dear Region 9,

This letter is sent pursuant to the Freedom of Information Act, 5 U.S.C. §552, as amended by Public Law No. 104-231, 110 Stat. 3048. I am requesting **certified** copies of the following:

1. All DOCUMENTS that contain any information regarding TESTING at the **TTX Company aka Train Trailer Company** located at **1400 Middle Harbor Road, Oakland, CA 94607** from 1975 to the present.

The term "DOCUMENTS" as used herein shall refer to all manually, mechanically or electronically written or recorded audio or visual materials and computer files, including but not limited to databases, electronic mail messages, financial data, spreadsheets, accounting system information, indices of computer records, correspondence, memoranda, telegrams, notations, raw data, protocols, records, receipts, invoices, bills, purchase orders, sales records, delivery records, shipping manifests, bids, contracts, contract logs, catalogs, specifications, approved material submittals and change orders, as-built specifications, applications specifications, blueprints, plans, diagrams, indexes, computer-stored records, computer record indexes, microfilms, microfiche, warranties, guarantees, calendars, diaries, videotapes, images in computer or machine readable format, including, but not limited to, images and images of DOCUMENTS, stored on media such as, Compact Discs ("CD"), Digital Video Disc/Digital Versatile Discs ("DVD"), computer hard drives, computer back up tapes, or other electronic media, and/or including but not limited to, formats such as Portable Document Format (".pdf"), Graphic Interchange Format (".gif"), Tagged Image File (".tif"), Joint Photographic Experts Group (".jpeg"/".jpg"), Hypertext Markup Language (".html"), etc., photographs, tape recordings, asbestos surveys, asbestos sample

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testing reports, abatement reports, books, brochures, safety manuals, union regulations, company regulations, depositions, trial testimony, trial exhibits, and statements.

The term "TESTING" as used herein shall refer to any kind of measurement, testing, sampling or quantification, of the air or physical environment anywhere at the subject premises, including fiber analysis, constituent analysis, evaluations, airborne measurement, assessment, comparison, visual examination, microscopic examination, dust studies, measurements of ambient dust level and/or safety surveys, asbestos surveys, asbestos sample testing.

2. All DOCUMENTS that contain any information regarding VIOLATIONS at the **TTX Company aka Train Trailer Company** located at **1400 Middle Harbor Road, Oakland, CA. 94607** from 1975 to the present.

The term "VIOLATIONS" as used herein shall refer to any violation, citation, inspection, investigation, information memorandum, special order, complaint, and/or decision.

This information is needed in conjunction with ongoing asbestos litigation in Alameda County, California.

I understand that there may be charges associated with the retrieval, copying, and certification of the requested documents. We will pay all such charges as deemed reasonable under the Act. I look forward to your response to this request.

Very truly yours,



Trish Olsen

TO:to